

## UNITED STATES DISTRICT COURT

for the

\_\_\_\_\_ District of \_\_\_\_\_

v.

)  
)  
)  
)  
)

Case No.:

## BILL OF COSTS

Judgment having been entered in the above entitled action on \_\_\_\_\_ against \_\_\_\_\_ ,  
*Date*  
 the Clerk is requested to tax the following as costs:

Fees of the Clerk .....	\$ _____
Fees for service of summons and subpoena .....	_____
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case .....	_____
Fees and disbursements for printing .....	_____
Fees for witnesses ( <i>itemize on page two</i> ) .....	_____
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case. ....	_____
Docket fees under 28 U.S.C. 1923 .....	_____
Costs as shown on Mandate of Court of Appeals .....	_____
Compensation of court-appointed experts .....	_____
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828 .....	_____
Other costs ( <i>please itemize</i> ) .....	_____
<b>TOTAL</b>	<b>\$ _____</b>

**SPECIAL NOTE:** Attach to your bill an itemization and documentation for requested costs in all categories.

## Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

☐ Electronic service☐ First class mail, postage prepaid☐ Other: \_\_\_\_\_

s/ Attorney: \_\_\_\_\_

Name of Attorney: \_\_\_\_\_

For: \_\_\_\_\_ Date: 11/22/2022

*Name of Claiming Party*

## Taxation of Costs

Costs are taxed in the amount of \_\_\_\_\_ and included in the judgment.

By: \_\_\_\_\_

*Clerk of Court**Deputy Clerk**Date*

	A	B	C	D
1	Date	Attorney	Cost For	Amount
2	5/19/2021	Defendant	Certified Copy of Deposition Transcript of Randy Knight	\$ 309.00
3	7/2/2021	Plaintiff	Certified Copy of Deposition Transcript of Bryan Cox	\$ 285.14
4	7/2/2021	Defendant*	Mileage to D&R Reporting in Tulsa for Plaintiff's Deposition of Brian Cox	\$ 116.48
5	7/6/2021	Defendant	Original and Certified Copy of Deposition Transcript of Laurie Garland	\$ 1,382.09
6	7/9/2021	Plaintiff	Certified Copy of Deposition Transcript of Penny Lewis	\$ 163.00
7	7/9/2021	Defendant*	Mileage to D&R Reporting in Tulsa for Plaintiff's Deposition of Penny Lewis	\$ 116.48
8	7/14/2021	Plaintiff	Certified Copy of Deposition Transcript of Christopher Redeagle	\$ 478.99
9	8/25/2022	Plaintiff	Certified Copy of Deposition Transcript of Sharon McCoy	\$ 363.00
10	8/25/2022	Defendant**	Mileage to McAlester for Plaintiff's Deposition of Sharon McCoy	\$ 161.00
11	<b>TOTAL COSTS</b>			<b>\$ 3,375.18</b>
12				
13	*mileage for the depositions of Bryan Cox and Penny Lewis were figured at the IRS Rate of .56 per mile x 208 miles (round trip)			
14				
15	** mileage for the deposition of Sharon McCoy was figured at the IRS Rate of .62 per mile x 260 miles (round trip)			
16				

*Leesa Thompson***INVOICE**

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128996	7/27/2021	36652
Job Date	Case No.	
7/14/2021		
Case Name		
Garland v. State of OK		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:  
Christopher Redeagle

478.99

**TOTAL DUE >>>****\$478.99**

Location of Job : D & R - Tulsa  
401 S. Boston Ave., Ste 310  
Tulsa, OK 74103

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

(-) Payments/Credits: 478.99

(+) Finance Charges/Debits: 0.00

(=) New Balance: **\$0.00**

**Tax ID:** 73-1334253

*Please detach bottom portion and return with payment.*

Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128996  
Invoice Date : 7/27/2021  
**Total Due : \$0.00**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36652  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. State of OK

**INVOICE**

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128996	7/27/2021	36652
Job Date	Case No.	
7/14/2021		
Case Name		
Garland v. State of OK		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:  
Christopher Redeagle

478.99

**TOTAL DUE >>>****\$478.99**

Location of Job : D & R - Tulsa  
401 S. Boston Ave., Ste 310  
Tulsa, OK 74103

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

**Tax ID:** 73-1334253

*Please detach bottom portion and return with payment.*

Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128996  
Invoice Date : 7/27/2021  
**Total Due : \$478.99**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36652  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. State of OK

# STATEMENT

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Account No.	Date
C7116	8/20/2021

Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

1 - 30 days	31 - 60 days	61 - 90 days
\$478.99	\$0.00	\$0.00
91 - 120 days	121 days & Over	Total Due
\$0.00	\$0.00	<b>\$478.99</b>

Invoice Date	Invoice No.	Balance	Job No.	Job Date	Witness	Case
7/27/2021	128996	478.99	36652	7/14/2021	Christopher Redeagle	Garland v. State of OK

**Tax ID:** 73-1334253

*Please detach bottom portion and return with payment.*

Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

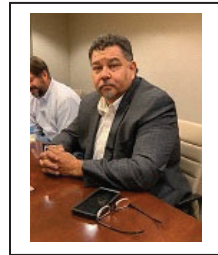
Account No. : C7116  
Date : 8/20/2021

**Total Due : \$478.99**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

(1) LAURIE GARLAND, an )  
individual, )  
 )  
Plaintiff, )  
 )  
-vs- ) No. CIV-2020-206-RAW  
 )  
(1) STATE OF OKLAHOMA EX REL )  
OKLAHOMA DEPARTMENT OF )  
CORRECTIONS )  
(2) CHRISTOPHER REDEAGLE, )  
individually )  
(3) SHARON McCOY, individually )  
(4) JOE ALLBAUGH, individually )  
(5) PENNY LEWIS, individually )  
(6) RABEKAH MOONEYHAM, )  
individually )  
(7) HEATHER CARLSON, )  
individually )  
(8) BOARD OF CORRECTIONS )  
 )  
Defendants. )



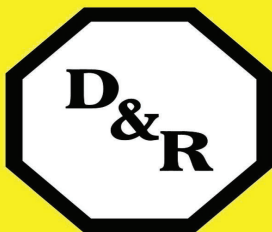
DEPOSITION OF CHRISTOPHER REDEAGLE

TAKEN ON BEHALF OF THE PLAINTIFF

IN TULSA, OKLAHOMA

On JULY 14, 2021

REPORTED BY: KASEY D. EGELSTON, CSR



**METROPOLITAN BUILDING**  
400 North Walker, Suite 160  
Oklahoma City, OK 73102  
405-235-4106

**MID-CONTINENT TOWER**  
401 South Boston, Suite 310  
Tulsa, OK 74103  
918-599-0507

[depo@drreporting.com](mailto:depo@drreporting.com)

**REPORTING & VIDEO, INC.**

Christopher Redeagle

July 14, 2021

Page 2

1 A P P E A R A N C E S

2 FOR THE PLAINTIFF:

3 E.W. KELLER  
HENRY DALTON  
4 Attorneys at Law  
KELLER, KELLER & DALTON, PC  
5 201 Robert S. Kerr, Suite 1001  
Oklahoma City, Oklahoma 73102  
6 kkd.law@coxinet.net

7 FOR THE DEFENDANTS:

8 KARI HAWKINS  
JEB JOSEPH  
9 Attorneys at Law  
Assistant Attorney General  
10 313 Northeast 21st Street  
Oklahoma City, Oklahoma 73105

11 FOR THE DEFENDANT CHRISTOPHER REDEAGLE:

12 ANTHONY L. ALLEN  
13 Attorney at Law  
ANTHONY ALLEN & ASSOCIATES  
14 106 South Okmulgee Avenue  
Okmulgee, Oklahoma 74447  
15 tony@anthonylallen.com

16 ALSO PRESENT:

17 Breann Johnson, Legal Intern  
18  
19  
20  
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23  
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25

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*Lessa Thompson***INVOICE**

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128983	7/26/2021	36547
Job Date	Case No.	
7/9/2021		
Case Name		
Garland v. Redeagle		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Penny Lewis

163.00

**TOTAL DUE >>>****\$163.00**

Location of Job : D & R - Tulsa  
401 S. Boston Ave., Ste 310  
Tulsa, OK 74103

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

(-) Payments/Credits: 163.00

(+) Finance Charges/Debits: 0.00

(=) New Balance: **\$0.00**

**Tax ID:** 73-1334253*Please detach bottom portion and return with payment.*

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128983  
Invoice Date : 7/26/2021  
**Total Due : \$0.00**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36547  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. Redeagle

**INVOICE**

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128983	7/26/2021	36547
Job Date	Case No.	
7/9/2021		
Case Name		
Garland v. Redeagle		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Penny Lewis

163.00

**TOTAL DUE >>>**

**\$163.00**

Location of Job : D & R - Tulsa  
401 S. Boston Ave., Ste 310  
Tulsa, OK 74103

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**Tax ID:** 73-1334253

*Please detach bottom portion and return with payment.*

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128983  
Invoice Date : 7/26/2021  
**Total Due : \$163.00**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36547  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. Redeagle

Penny Lewis

July 9, 2021

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND, an individual, )  
)  
Plaintiff )  
)  
v. ) CIV-2020-306-RAW  
)  
STATE OF OKLAHOMA EX REL )  
OKLAHOMA DEPARTMENT OF )  
CORRECTIONS, CHRISTOPHER )  
REDEAGLE, individually; SHARON )  
MCCOY, individually; JOE )  
ALLBAUGH, individually; PENNY )  
LEWIS, individually; RABEKAH )  
MOONEYHAM, individually; )  
HEATHER CARLSON, individually; )  
BOARD OF CORRECTIONS, )  
)  
Defendants. )

DEPOSITION OF  
PENNY SUE LEWIS  
HELD IN TULSA, OKLAHOMA  
ON JULY 9TH, 2021

Prepared by: DEBORAH S. (DEBI) REINHARDT, CCR, CSR

Penny Lewis

July 9, 2021

Page 2

1 APPEARANCES

2 For the Plaintiff:

3 HENRY DALTON, ESQ.  
4 KELLER, KELLER & DALTON  
5 201 ROBERT S. KERR, #1001  
6 OKLAHOMA CITY, OKLAHOMA 73102  
7 405.235.6693  
8 KKD.LAW@COXINET.NET

9 For the Defendants:

10 KARI Y. HAWKINS, ESQ.  
11 ATTORNEY GENERAL'S OFFICE  
12 313 NE 21ST STREET  
13 OKLAHOMA CITY, OKLAHOMA 73105  
14 JEB.JOSEPH@OAG.OK.GOV  
15 KARI.HAWKINS@OAG.OK.GOV

16 For Defendant Joe Allbaugh:

17 ANTHONY ALLEN, ESQ.  
18 ATTORNEY AT LAW  
19 106 S. OKMULGEE AVE.  
20 OKMULGEE, OKLAHOMA 74447

21

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Penny Lewis

July 9, 2021

Page 3

1 STIPULATIONS

2 It is stipulated and agreed by and between  
3 the parties hereto that all objections, except as to  
4 the form of the questions, are reserved to the time  
5 of trial with the same force and effect as if made  
6 at the taking of the deposition.

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Penny Lewis

July 9, 2021

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DEPOSITION EXHIBITS

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*Leesa Thompson***INVOICE**

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128927	7/20/2021	36546
Job Date	Case No.	
7/2/2021		
Case Name		
Garland v. Redeagle		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Bryan Cox

285.14

**TOTAL DUE >>>**

**\$285.14**

Location of Job : D & R - Tulsa  
401 S. Boston Ave., Ste 310  
Tulsa, OK 74103

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

(-) Payments/Credits: 285.14

(+) Finance Charges/Debits: 0.00

(=) New Balance: **\$0.00**

**Tax ID:** 73-1334253

*Please detach bottom portion and return with payment.*

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128927  
Invoice Date : 7/20/2021  
**Total Due : \$0.00**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36546  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. Redeagle

# INVOICE

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128927	7/20/2021	36546
Job Date	Case No.	
7/2/2021		
Case Name		
Garland v. Redeagle		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:  
Bryan Cox

285.14

**TOTAL DUE >>>****\$285.14**

Location of Job : D & R - Tulsa  
401 S. Boston Ave., Ste 310  
Tulsa, OK 74103

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**Tax ID:** 73-1334253

*Please detach bottom portion and return with payment.*

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128927  
Invoice Date : 7/20/2021  
**Total Due : \$285.14**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36546  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. Redeagle



Bryan Cox

July 2, 2021

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND, an individual, )  
)  
Plaintiff )  
)  
v. ) CIV-2020-306-RAW  
)  
STATE OF OKLAHOMA EX REL )  
OKLAHOMA DEPARTMENT OF )  
CORRECTIONS, CHRISTOPHER )  
REDEAGLE, individually; SHARON )  
MCCOY, individually; JOE )  
ALLBAUGH, individually; PENNY )  
LEWIS, individually; RABEKAH )  
MOONEYHAM, individually; )  
HEATHER CARLSON, individually; )  
BOARD OF CORRECTIONS, )  
)  
Defendants. )

DEPOSITION OF  
BRYAN COX  
HELD IN TULSA, OKLAHOMA  
ON JULY 2ND, 2021

Prepared by: DEBORAH S. (DEBI) REINHARDT, CCR, CSR

Bryan Cox

July 2, 2021

Page 2

1 APPEARANCES

2 For the Plaintiff:

3 HENRY DALTON, ESQ.  
4 KELLER, KELLER & DALTON  
5 201 ROBERT S. KERR, #1001  
6 OKLAHOMA CITY, OKLAHOMA 73102  
7 405.235.6693  
8 KKD.LAW@COXINET.NET

9 For the Defendants:

10 JEB JOSEPH, ESQ.  
11 KARI y. HAWKINS, ESQ.  
12 ATTORNEY GENERAL'S OFFICE  
13 313 NE 21ST STREET  
14 OKLAHOMA CITY, OKLAHOMA 73105  
15 JEB.JOSEPH@OAG.OK.GOV

16

17 For Defendant Joe Allbaugh:

18 ANTHONY ALLEN  
19 106 S. OKMULGEE AVE.  
20 OKMULGEE, OKLAHOMA 74447

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Bryan Cox

July 2, 2021

Page 3

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STIPULATIONS

It is stipulated and agreed by and between the parties hereto that all objections, except as to the form of the questions, are reserved to the time of trial with the same force and effect as if made at the taking of the deposition.

Bryan Cox

July 2, 2021

Page 4

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DEPOSITION EXHIBITS

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*Leesa Thompson***INVOICE**

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128572	6/8/2021	36045
Job Date	Case No.	
5/19/2021		
Case Name		
Garland v. Eddie Warrior Correctional		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:  
Randy Knight

309.00

**TOTAL DUE >>>****\$309.00**

Location of Job : D & R OKC  
400 N. Walker, Suite 160  
Oklahoma City, OK 73102

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

(-) Payments/Credits: 309.00

(+) Finance Charges/Debits: 0.00

(=) New Balance: **\$0.00**

**Tax ID:** 73-1334253

*Please detach bottom portion and return with payment.*

Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128572  
Invoice Date : 6/8/2021  
**Total Due : \$0.00**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36045  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. Eddie Warrior Correctional

*Okay to Pay.*  
*Kari Hawkins*

**INVOICE**

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128572	6/8/2021	36045
Job Date	Case No.	
5/19/2021		
Case Name		
Garland v. Eddie Warrior Correctional		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:  
Randy Knight

309.00  
**TOTAL DUE >>> \$309.00**

Location of Job : D & R OKC  
400 N. Walker, Suite 160  
Oklahoma City, OK 73102

All billing questions should be addressed within 15 days of receipt of invoice otherwise the billing will be considered accepted as billed.

Thank you for choosing D&R Reporting & Video, Inc., for all your litigation support needs. We appreciate your business.

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Kari Hawkins  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128572  
Invoice Date : 6/8/2021  
**Total Due : \$309.00**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36045  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. Eddie Warrior Correctional

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA

(1) LAURIE GARLAND, an )  
individual, )  
Plaintiff, )

vs. )

Case No. CIV 2020-306-RAW

(1) STATE OF OKLAHOMA EX )  
REL OKLAHOMA DEPARTMENT OF )  
CORRECTIONS, )  
(2) CHRISTOPHER REDEAGLE, )  
individually )  
(3) SHARON MCCOY, )  
individually, )  
(4) JOE ALLBAUGH, )  
individually, )  
(5) PENNY LEWIS, )  
individually, )  
(6) RABEKAH MOONEYHAM, )  
individually )  
(7) HEATHER CARLSON, )  
individually )  
(8) BOARD OF CORRECTIONS, )  
Defendants. )



DEPOSITION OF RANDY KNIGHT  
TAKEN ON BEHALF OF THE PLAINTIFF  
IN OKLAHOMA CITY, OKLAHOMA

MAY 19, 2021

REPORTED BY: JULIA JACKSON, CSR

Randy Knight

May 19, 2021

Page 2

1 A P P E A R A N C E S

2

3 FOR THE PLAINTIFF:

4 HENRY DALTON

5 EW KELLER

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8 Oklahoma City, OK 73102

9 (405)235-6693

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12

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14 FOR THE DEFENDANTS:

15 JEB JOSEPH

16 KARI HAWKINS

17 Attorney General's Office

18 313 NE 21st Street

19 Oklahoma City, OK 73105

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23 FOR THE DEFENDANT CHRISTOPHER REDEAGLE:

24 ANTHONY ALLEN

25 Anthony Allen & Associates

106 S. Okmulgee Avenuee

Okmulgee, OK 74447

(800)409-1915

anthony@oklahomaslawfirm.com

20

21

22 ALSO PRESENT:

23 Breann Johnson

24

25

26



Randy Knight

May 19, 2021

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*Leesa Thompson***INVOICE**

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
128871	7/15/2021	36625
Job Date	Case No.	
7/6/2021		
Case Name		
Garland v. State of OK		
Payment Terms		
Due upon receipt		

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Laurie Garland

1,382.98

**TOTAL DUE >>>**

**\$1,382.98**

Location of Job : D & R OKC  
400 N. Walker, Suite 160  
Oklahoma City, OK 73102

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**(-) Payments/Credits:** 1,382.98

**(+) Finance Charges/Debits:** 0.00

**(=) New Balance:** **\$0.00**

**Tax ID:** 73-1334253

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Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128871  
Invoice Date : 7/15/2021  
**Total Due : \$0.00**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36625  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. State of OK

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1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
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Job Date	Case No.	
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400 N. Walker, Suite 160  
Oklahoma City, OK 73102

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Jeb Joseph  
Assistant Attorney General  
313 NE 21st  
Oklahoma City, OK 73105

Invoice No. : 128871  
Invoice Date : 7/15/2021  
**Total Due : \$1,382.98**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 36625  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. State of OK

Laurie Garland

July 6, 2021

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	NO. CIV-20-306-RAW
	)	
	)	
STATE OF OKLAHOMA, ex rel	)	
OKLAHOMA DEPARTMENT OF	)	
CORRECTIONS,	)	
CHRISTOPHER REDEAGLE,	)	
individually,	)	
SHARON McCOY, individually,	)	
JOE ALLBAUGH, individually,	)	
RABECKAH MOONYHAM,	)	
individually,	)	
HEATHER CARLSON, individually,	)	
and BOARD OF CORRECTIONS,	)	
	)	
Defendants.	)	

DEPOSITION OF LAURIE ELIZABETH GARLAND  
TAKEN ON BEHALF OF THE DEFENDANTS  
IN OKLAHOMA CITY, OKLAHOMA  
ON JULY 6, 2021, 2021

REPORTED BY: JANA C. HAZELBAKER, CSR

A P P E A R A N C E S

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For the Plaintiff: Henry Dalton  
Keller, Keller & Dalton  
201 Robert S. Kerr  
Suite 1001  
Oklahoma City, OK 73102  
(405)235-6693  
kkd.law@coxinet.net

For the Defendant,  
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Attorney at Law  
106 South Okmulgee Avenue  
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tony@anthonylallen.com

For the Defendants,  
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ex rel Oklahoma  
Department of  
Corrections, et al.: Jeb Joseph  
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Assistant Attorney General  
313 Northeast 21st Street  
Oklahoma City, OK 73105  
(405)522-2976  
jeb.joseph@oag.ok.gov  
kari.hawkins@oag.ok.gov

Also Present: Breann Johnson, intern

Laurie Garland

July 6, 2021

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# INVOICE

1 of 1

D&R Reporting & Video, Inc.  
Metropolitan Building  
400 N. Walker  
Suite 160  
Oklahoma City, OK 73102

Jessica Wilkes  
Office of the Attorney General  
313 NE 21st Street  
Oklahoma City, OK 73105

Invoice No.	Invoice Date	Job No.
132351	9/6/2022	39685
Job Date	Case No.	
8/25/2022		
Case Name		
Garland v. State of OK		
Payment Terms		
Due upon receipt		

1 CERTIFIED COPY OF TRANSCRIPT OF:  
Susan McCoy

363.00

**TOTAL DUE >>>****\$363.00**

Location of Job : Jeffrey Contreras  
25 East Carl Albert Parkway, Suite A  
Mcalester, OK 74501

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Jessica Wilkes  
Office of the Attorney General  
313 NE 21st Street  
Oklahoma City, OK 73105

Invoice No. : 132351  
Invoice Date : 9/6/2022  
**Total Due : \$363.00**

Remit To: **D&R Reporting & Video, Inc.**  
**Metropolitan Building**  
**400 N. Walker**  
**Suite 160**  
**Oklahoma City, OK 73102**

Job No. : 39685  
BU ID : 1-MAIN  
Case No. :  
Case Name : Garland v. State of OK

Sharon McCoy

August 25, 2022

Page 1

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. CIV-2020-306-RAW
	)	
STATE OF OKLAHOMA ex rel	)	
OKLAHOMA DEPARTMENT OF	)	
CORRECTIONS, CHRISTOPHER	)	
REDEAGLE, Individually,	)	
SHARON McCOY, Individually,	)	
JOE ALLBAUGH, Individually,	)	
PENNY LEWIS, Individually,	)	
RABEKAH MOONEYHAM,	)	
Individually, HEATHER	)	
CARLSON, Individually and	)	
BOARD OF CORRECTIONS,	)	
	)	
Defendants.	)	

\* \* \* \* \*

DEPOSITION OF SHARON McCOY

TAKEN ON BEHALF OF THE PLAINTIFF

IN MCALESTER, OKLAHOMA

ON AUGUST 25, 2022

\* \* \* \* \*

\*\*\*\*\*ALL EXHIBITS ARE CONFIDENTIAL  
AND SUBJECT TO PROTECTIVE ORDER\*\*\*\*\*



Sharon McCoy

August 25, 2022

Page 2

1 APPEARANCES

2  
3 FOR THE PLAINTIFF:

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10 kkd.law@coxinet.net

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20 jeb.joseph@oag.ok.gov

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25 Okmulgee, Oklahoma 74447  
800-409-1915  
anthony@anthonylallen.com

ALSO PRESENT: David San Martin, Attorney for DOC

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA**

(1) LAURIE GARLAND,

Plaintiff,

v.

(1) STATE OF OKLAHOMA, *ex rel.*,  
OKLAHOMA DEPARTMENT OF  
CORRECTIONS, et al.,

Defendant.

**Case No.: 20-cv-306-JWB**

**DECLARATION OF JEB E. JOSEPH**

STATE OF OKLAHOMA            )  
                                                  )       ss.  
COUNTY OF OKLAHOMA        )

Jeb E. Joseph, being of lawful age, and first being sworn upon his oath, deposes and states as follows:

1. I am an Assistant Attorney General with the Oklahoma Attorney General's Office, and I am co-counsel of Record for Defendants Sharon McCoy and Penny Lewis. As such, I have personal knowledge of the matters set forth herein.

2. At the requests of Plaintiff, Assistant Attorneys General traveled from their office in Oklahoma City, OK, to present and/or attend the following witness depositions, in the respectively listed cities, and on the dates indicated:

a. Randy Knight	Oklahoma City, OK	May 19, 2021;
b. Bryan Cox	Tulsa, OK	July 2, 2021;
c. Penny Lewis	Tulsa, OK	July 9, 2021;
d. Christopher Redeagle	Tulsa, OK	July 14, 2021; and
e. Sharon McCoy	McAlester, OK	August 25, 2022

The costs for deposition transcripts and mileage are included in Defendants' Bill of Costs [Doc. 119] and Brief in Support of Bill of Costs [Doc. 120].

3. The Office of the Attorney General paid an amount totaling \$2,981.22 for the transcripts in this matter.

4. The total mileage traveled by the Assistant Attorneys General is 676, and is reflected in the Bill of Costs. [Doc. 119].

Dated this 22nd day of November 2022.



---

**JEB E. JOSEPH, OBA #19137**

Assistant Attorneys General

Oklahoma Attorney General's Office

Litigation Division

313 NE 21st Street

Oklahoma City, Oklahoma 73105

Telephone: (405) 521-3921

Facsimile: (405) 521-4518

Email: [jeb.joseph@oag.ok.gov](mailto:jeb.joseph@oag.ok.gov)

*Attorneys for Defendants*